

Brent H. Blakely (SBN 157292)
bblakely@blakelylawgroup.com
Jessica C. Covington (SBN 301816)
jcovington@blakelylawgroup.com
BLAKELY LAW GROUP
1334 Parkview Avenue, Suite 280
Manhattan Beach, California 90266
Telephone: (310) 546-7400
Facsimile: (310) 546-7401

*Attorneys for Defendants
Essential Consultants, LLC and Michael Cohen*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

STEPHANIE CLIFFORD a.k.a.
STORMY DANIELS a.k.a. PEGGY
PETERSON, an individual,

15 Plaintiff,
16 v.

DONALD J. TRUMP a.k.a. DAVID DENNISON, an individual, ESSENTIAL CONSULTANTS, LLC, a Delaware Limited Liability Company, MICHAEL COHEN, an individual, and DOES 1 through 10, inclusive.

Defendants.

Case No. 2:18-CV-02217-SJO-FFM

DECLARATION OF BRENT H. BLAKELY IN SUPPORT OF DEFENDANT MICHAEL COHEN'S OPPOSITION TO PLAINTIFF'S MOTION TO AMEND COMPLAINT

Assigned to the Hon. S. James Otero
Action Filed: March 6, 2018

Date: December 3, 2018
Time: 10:00 a.m.
Location: 350 West 1st Street
Courtroom 10C, 10th Floor
Los Angeles, CA 90012

DECLARATION OF BRENT H. BLAKELY

I, Brent H. Blakely, declare:

3 1. I am an attorney duly licensed to practice before all courts of the State of
4 California and in the U.S. District Court for the Central District of California, among
5 other courts. I am a partner of the law firm of Blakely Law Group, counsel of record
6 for Defendant Essential Consultants LLC and Michael Cohen. I make this declaration
7 based on my own personal knowledge and, if called and sworn as a witness, I could
8 and would competently testify hereto.

9 2. Attached hereto as **Exhibit 1** is a true and correct copy of a letter dated
10 October 25, 2018 from Senator Charles E. Grassley, Chairman, Committee on the
11 Judiciary, to The Honorable Jeff Sessions and The Honorable Christopher A. Wray.

12 3. Attached hereto as **Exhibit 2** is a true and correct copy this Court's
13 Order dated October 15, 2018 granting Donald Trump's Anti-SLAPP motion in
14 *Clifford v. Trump*, case No. 18-06893.

15 4. Attached hereto as **Exhibit 3** is a true and correct copy of the order
16 Granting Motion to Dismiss with Leave to Amend and Deferring Consideration of
17 Special Motion to Strike in *Verizon v. Covad*, USDC Northern District of California,
18 case No. 01-20524.

19 5. Attached hereto as **Exhibit 4** is a true and correct copy of an article from
20 the Los Angeles Times dated October 22, 2018, entitled Michael Avenatti is hit with a
21 \$4.85 million judgment for unpaid debt as court orders eviction of his law firm, which
22 can be found at <http://www.latimes.com/politics/la-na-pol-avenatti-eviction-20181022-story.html>
23

24 | //

25 | //

26 //

27 //

29 //

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

3 Executed on November 13, 2018, at Los Angeles, California.

4 /s/ *Brent H. Blakely*
5 BRENT H. BLAKELY

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28